



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Dates: 9/19/2022 to 9/20/2022
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Field Audit Inspection
Site/Facility Name: Borough of Shippensburg Wastewater Treatment Plant

Site/Facility Mailing Address: PO Box 129
963 Avon Drive
Shippensburg, PA 17257

Latitude: 40.0589 **Longitude:** -77.5322
County/Parish: Franklin County
Permit Number: PA0030643
NAICS Code: 221320
Unique Project #: 3E22WN018A

Site/Facility Representative: Wade Farner, Operations Manager/Pretreatment Coordinator **Point of Contact** ☒
Phone: (717) 532-5414 Email: wfarner@shippensburg.pa.us

EPA Inspector: Jim Kline
Phone: 304 234-0263 Email: Kline.james@epa.gov

Report Preparer James Kline (3ED13) **Date**
Signature/Date 1060 Chapline Street Ste 303
Wheeling, WV 26003-2995

Supervisor

Signature/Date
Jessica Duffy, Acting ESS Chief **Date**
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2852

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I. Introduction

On September 19th and 20th, 2022, the United States Environmental Protection Agency, Region III (EPA), Enforcement & Compliance Assurance Division, Enforcement Support Section, conducted an announced onsite Field Audit Inspection at the Shippensburg Borough Wastewater Treatment Plant (hereinafter, “the Facility”). The Facility is located at 963 Avon Drive in Shippensburg, Franklin County, Pennsylvania (**See Attachment #1- Photo #1**).

The purpose of the inspection was to observe compliance with the Pre-Treatment Regulations of the Clean Water Act (CWA) and to verify compliance with the National Pollutant Discharge Elimination System (NPDES) and applicable State and Federal regulations. The U.S. EPA lead inspector was Inspector Jim Kline (Inspector Kline). Prior to the inspection, advance notification was sent to the Pennsylvania Department of Environmental Protection (PADEP). No PADEP Representatives attended the inspection.

A. Opening Conference

Inspector Kline arrived at the Facility on Monday, September 19th, 2022, at 12:30PM and presented his credentials to Mr. Wade Farner, Operational Manager for the Facility. Inspector Kline conducted an opening conference with Mr. Farner. Inspector Kline explained the purpose and scope of the inspection to Mr. Farner. Mr. Lance Hoover, President of High Tide Environmental attended a portion of the Opening Conference as a consultant to the Facility. Mr. Hoover was a former employee at the Facility.

Inspector Kline requested that any information that the Facility deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures.

B. Weather and Precipitation Conditions

During the first day of the inspection, the weather was partly cloudy with temperature highs in the upper seventies. The second day of the inspection was partly cloudy with temperature highs in the lower eighties.

II. Facility Activity

Mr. Farner stated that he is the Operational Manager for the Wastewater Treatment Plant. Mr. Farner added the Pretreatment Coordinator position is currently vacant. Mr. Farner stated he conducts the duties of the Pretreatment Coordinator until the position is filled.

Mr. Farner stated that they have five Industrial Users (IUs) (**See Attachment #2**). According to Mr. Farner all the IUs are Significant Non-categorical Industrial Users (SNIUs). Mr. Farner added that all IUs are hard piped to the Facility.

Inspector Kline requested to review all IU folders. Inspector Kline asked Mr. Farner if any IU had ongoing issues or permit exceedances. Mr. Farner stated in the past three years three of the IUs had exceedances all of which occurred in 2021:

- Chamberlin and Wingert Sanitary Services LLC- two phosphorous exceedances
- Volvo Construction Equipment, North America, LLC- two flow exceedances
- Cumberland Valley Rental (CVR)- one nickel exceedance

Mr. Farner stated each exceedance resulted in the IU receiving a notice of violation (NOV) and a fine which were all paid.

While reviewing the IU folders, Inspector Kline asked Mr. Farner if any of the IU Permits had expired. Mr. Farner stated the Facility had been very busy, didn't have a full staff and as a result three IUs permits had expired:

- Chamberlin and Wingert Sanitary Services LLC
- Shippensburg University
- Cumberland Valley Rental (CVR)

Inspector Kline completed the Field Audit Checklist with input from Mr. Farner (**See Attachment #2**). Inspector Kline selected Cumberland Valley Rental (CVR) located at 111 West King Street in Shippensburg to conduct the IU portion of the Field Audit Inspection. Inspector Kline decided to meet with Mr. Farner at CVR on September 20, 2022, at 8:30 AM. This concluded the inspection for the day.

III. Observations (IU)

Inspector Kline, Mr. Farner met at CVR (**See Attachment #1- Photos #2 & #3**). Mr. Farner introduced Inspector Kline to Mr. Bill Weaver, Maintenance. Inspector Kline presented his credentials to Mr. Weaver. Mr. Weaver stated Mr. Tim Fry was the owner and would not be in today. Inspector Kline requested that Mr. Weaver call Mr Fry and inform him of the inspection. Inspector Kline spoke with Mr Fry on the telephone. Inspector Kline proceeded with the opening conference attending were Mr Farner from the Facility, Mr Weaver from CVR and Mr Fry was on the speakerphone.

Inspector Kline requested that any information that the Facility deemed to be confidential business information (CBI) should be identified during the inspection and it would be handled as CBI according to the EPA CBI procedures. Mr. Fry stated there wouldn't be any CBI claims.

Mr. Weaver and Mr. Fry briefly described operations at the CVR location. According to Mr. Fry, CVR conducts dry cleaning and laundry services. Mr. Fry added his family built CVR at this location back in 1976 and he has been the sole owner since 2019. Mr. Fry stated CVR has twenty-two full-time and two part-time employees.

Inspector Kline asked Mr. Fry and Mr. Weaver if any sampling occurs at CVR. Mr. Weaver stated he collects both grab and composite samples. Mr. Weaver added he starts composite samples Monday mornings and on Tuesday he finishes the composite sampling, and he also collects a grab sample on Tuesdays. Mr. Weaver stated he fills out the chain of custody and drives the samples to a third-party lab (Franklin Analytical) in Chambersburg for analysis. Inspector Kline asked if the third-party lab or the Facility conducts any sampling. Mr. Weaver stated the same third-party lab samples once per year. Mr. Farner stated this is done at the Facility's request and is their annual sampling event.

Inspector Kline asked Mr. Fry and Mr. Weaver if CVR generates any hazardous waste or has a hazardous waste identification number. Mr. Fry stated CVR is Clean Generator Certified and receives their dry-cleaning supplies from Ferguson.

Inspector Kline, Mr. Farner and Mr. Weaver toured CVR. Inspector Kline observed a grated floor drain near the laundry machines (**See Attachment #1- Photos #4 & #5**). According to Mr. Weaver, the floor drains collect laundry wastewater discharge, grease, clothing lint, and sediments in the floor drain. Mr. Weaver added the drain is connected to the discharge pipe which is connected to the Facility. Inspector Kline requested to see where all samples are collected. Mr. Weaver escorted Inspector Kline to the permitted outfall (**See Attachment #1- Photo #6**). Mr. Farner verified the sample location being correct. Both Mr. Weaver and Mr. Farner stated this was the last possible spot to get a sample before it returns to the Facility. Inspector Kline requested to see the composite sampler used by CVR. Mr. Weaver showed the composite sampler to Inspector Kline (**See Attachment #1- Photo #7**). The composite sample was an ISCO Model 1680. Mr. Weaver briefly went over the set-up, operation and calibration of the composite sampler with Inspector Kline.

Inspector Kline observed ten 5-gallon containers adjacent to a dry-cleaning unit (**See Attachment #1- Photo #8**). Inspector Kline observed the label on the container indicating the contents were Perchloroethylene (**See Attachment #1- Photo #9**). Mr. Weaver stated the perchloroethylene (Perc) was used in the drycleaning unit. Inspector Kline asked if the ten containers were waste Perc or unused Perc. Mr. Weaver stated the containers of Perc were new and would be used in that dry cleaning unit. Inspector Kline asked if the dry-cleaning process generated any waste. Mr. Weaver stated the Perc is pretty much used up during dry cleaning but there is still some waste that is generated. Mr. Weaver stated that when the unit needs to be cleaned out, the waste is dumped into a 55-gallon drum. Inspector Kline asked Mr. Weaver if CVR generates any hazardous wastes. Mr. Weaver stated yes, and they had an area where they stored hazardous wastes. Mr. Weaver pointed to the area and escorted Inspector Kline there.

Inspector Kline observed a sign on the wall stating, "Caution Hazardous Material" (**See Attachment #1- Photo #10**). Inspector Kline observed a black 55-gallon drum sitting directly on the concrete floor. There was a lid placed on top of the drum and it was not securely closed. The drum did not have any labels on it. Inspector Kline asked Mr Weaver what was inside the drum. Mr Weaver removed the lid off the drum. Inspector Kline observed the contents, which appeared to be black fine to clumped powder along with a black liquid (**See Attachment #1- Photo #11**). Inspector Kline asked Mr. Weaver if he knew what was in the drum. Mr. Weaver stated it was the dry-cleaning sludge and that the drum should have a hazardous waste label on it. Inspector Kline asked Mr. Weaver to estimate how much sludge was in the drum. Mr. Weaver estimated the amount to be about ten gallons. Mr Weaver located a pre-filled out hazardous waste label and place it on the side of the drum. Inspector Kline observed the label, and it indicated the contents were waste tetrachloroethylene dry cleaner sludge/still bottoms. (**See Attachment #1- Photo #12**).

Inspector Kline conducted a brief closing conference at CVR. Mr. Weaver called Mr. Fry so Mr. Fry could attend via speakerphone. Mr. Weaver and Mr. Farner attended. Inspector Kline shared preliminary observations about CVR and the IU Pretreatment Program. This concluded the IU portion of the inspection.

V. Closing Conference

Inspector Kline and Mr. Farner returned to the Facility. Inspector Kline shared preliminary observations about the Facility and the IU Pretreatment Program. Inspector Kline reiterated with Mr. Farner that all the preliminary observations discussed were not compliance determinations. All preliminary observations shared are subject to further investigation by EPA staff upon the additional review of records and documentation. Additional observations may be contained in this inspection report and the attachments that were not identified at the time of the closing conference.

VI. Follow-up Communications

Inspector Kline received four e-mails from Mr. Farner. The first e-mail was dated September 19th (**See Attachment #3**), the second e-mail was dated September 19th (**See Attachment #4**), the third e-mail was dated September 28th (**See Attachment #5**). The last e-mail received was October 7th. This e-mail pertained to actions taken by the Facility regarding two of the expired IU permits (**See Attachment #6**). Mr. Farner indicated in the October 7th e-mail that the IU permits progressed but have not yet been reissued.

VII. List of Attachments

Attachment #1: Photographs

Attachment #2: POTW Field Audit Checklist

Attachment #3: 9/19/22 12:55PM Farner e-mail

Attachment #4: 9/19/22 2:54PM Farner e-mail

Attachment #5: 9/28/22 Farner e-mail

Attachment #6: 10/7/22 Farner e-mail